

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS AMERICA  
MARKETING FSI L.L.C., and NEWS  
AMERICA MARKETING IN-STORE  
SERVICES L.L.C.,

Defendants.

Case No.: 19-cv-1820 MJD/BRT

**JURY TRIAL DEMANDED**

**DECLARATION OF GLORIA PARK IN SUPPORT OF PLAINTIFF INSIGNIA'S  
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

I, Y. Gloria Park, declare and state as follows:

1. I am an attorney at Susman Godfrey L.L.P., one of the law firms representing Plaintiff Insignia Systems, Inc. ("Insignia").
2. I respectfully submit this declaration and the attached exhibits in support of Insignia's Motion to Compel Production of Documents.
3. Attached hereto as **Exhibit 1** is a table listing the 19 News employees who were deposed in *Valassis* and their relevance to this case.
4. Attached hereto as **Exhibit 2** is a true and correct copy of this Court's March 24, 2020 Order denying Insignia's motion to compel. This document is available at Dkt. 113 and is being resubmitted here for ease of reference.

5. Attached hereto as **Exhibit 3** is a true and correct copy of “News Corp Announces Sale of News America Marketing to Charlesbank Capital Partners,” Business Wire, Mar. 31, 2020, <https://newscorp.com/2020/03/31/news-corp-announces-sale-of-news-america-marketing-to-charlesbank-capital-partners/>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of Gloria Park’s July 1, 2020 email to Nicole Moen and others regarding the parties’ discovery dispute.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the parties’ joint letter to the Court, filed on June 5, 2020. This document was previously filed in this matter at Dkt. 185 and is being resubmitted here for ease of reference.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the parties’ joint letter to the Court, filed on August 5, 2020. This document was previously filed in this matter at Dkt. 232 and is being resubmitted here for ease of reference.

9. Attached hereto as **Exhibit 7** is a true and correct copy of Gloria Park’s August 6, 2020 email to Nicole Moen and others outlining Insignia’s discovery proposal.

10. Attached hereto as **Exhibit 8** is a true and correct copy of Nicole Moen’s August 20, 2020 email to Gloria Park and others rejecting Insignia’s discovery proposal.

11. Attached hereto as **Exhibit 9** is a true and correct copy of Gloria Park’s September 1, 2020 email to Nicole Moen and others regarding the parties’ discovery dispute.

12. Attached hereto as **Exhibit 10** is a true and correct copy of Nicole Moen’s September 3, 2020 email to Gloria Park and others regarding the parties’ discovery dispute.

13. Attached hereto as **Exhibit 11** is a true and correct copy of Nicole Moen's July 30, 2020 email to Gloria Park and others regarding the parties' discovery dispute.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the Court's May 21, 2020 Order granting Defendants' Motion for a Protective Order Regarding Plaintiff's Subpoenas. This document is available at Dkt. 151 and is being resubmitted here for ease of reference.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the parties' February 9, 2011 Settlement Agreement and Release. This document is filed under seal.

16. Attached hereto as **Exhibit 14** is a true and correct copy of Memorandum in Support of Defendants' Motion for Judgment on the Pleadings, filed on October 21, 2019. This document was previously filed in this matter at Dkt. 48 and is being resubmitted here for ease of reference.

17. Attached hereto as **Exhibit 15** is a true and correct copy of Defendants' Memorandum of Law in Opposition to Plaintiff's Motion to Compel, filed on March 2, 2020. This document was previously filed in this matter at Dkt. 94 and is being resubmitted here for ease of reference.

18. Attached hereto as **Exhibit 16** is a true and correct copy of News Corporation's Form 8-K, dated May 7, 2020.

19. Attached hereto as **Exhibit 17** is a true and correct copy of Marty Garofalo's LinkedIn page (<https://www.linkedin.com/in/marty-garofalo-bb5b38/>), accessed on September 3 and 8, 2020.

20. Attached hereto as **Exhibit 18** is a true and correct copy of Tracey Koller's LinkedIn page, accessed on September 3, 2020.

21. Attached hereto as **Exhibit 19** is a true and correct copy of Peter Moustakerski's LinkedIn page (<https://www.linkedin.com/in/peter-moustakerski/>), accessed on September 3 and 8, 2020.

22. Attached hereto as **Exhibit 20** is a true and correct copy of the document produced by Defendants bearing the beginning control number NAM-IS19-05959210. This document is designated Attorneys' Eyes Only under the Protective Order and is filed under seal.

23. Attached hereto as **Exhibit 21** is a true and correct copy of Defendants' Memorandum in Support of Its Motion for Summary Judgment on the Counterclaim, filed on July 10, 2020. This document was previously filed in this matter at Dkt. 195 and is being resubmitted here for ease of reference.

24. Attached hereto as **Exhibit 22** is a true and correct copy of the document produced by Defendants bearing the beginning control number NAM-IS19-06866429. This document is designated Attorneys' Eyes Only under the Protective Order and is filed under seal.

25. Attached hereto as **Exhibit 23** is a true and correct copy of publicly available Exhibit 10 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

26. Attached hereto as **Exhibit 24** is a true and correct copy of publicly available Exhibit 9 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

27. Attached hereto as **Exhibit 25** is a true and correct copy of publicly available Exhibit 15 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

28. Attached hereto as **Exhibit 26** is a true and correct copy of publicly available Exhibit 16 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

29. Attached hereto as **Exhibit 27** is a true and correct copy of publicly available Exhibit 18 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

30. Attached hereto as **Exhibit 28** is a true and correct copy of publicly available Exhibit 19 to the Declaration of Vincent Levy in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, Dkt. 272, *Valassis Commc'ns, Inc. v. News Corp. et al.*, No. 1:17-cv-07378-PKC (filed March 22, 2019).

31. Attached hereto as **Exhibit 29** is a true and correct copy of Gloria Park's February 28, 2020 email to Lina Dagneu and others regarding the negotiation of custodians for Insignia's First Set of RFPs.

32. Attached hereto as **Exhibit 30** is a true and correct copy of the document produced by Defendants bearing the beginning control number NAM-IS19-07069050. This document is designated Attorneys' Eyes Only under the Protective Order and is filed under seal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8<sup>th</sup> day of September, 2020.

/s/ Y. Gloria Park  
Y. Gloria Park